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June 5, 2020

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Calcano et al. v. Dig Inn Restaurant Group, LLC*
Case No.: 1:19-cv-11374-AT

Dear Judge Torres:

We represent defendant Dig Inn Restaurant Group, LLC (“Defendant”) in this case. We have conferred with counsel for named plaintiff, Evelina Calcano (“Plaintiff”), and write with their consent to respectfully request an extension of Defendant’s time to respond to the complaint, pursuant to Rule I(C) of Your Honor’s Individual Practices in Civil Cases.

The parties have utilized the extension of time most recently granted by the Court to engage in discussions and to make substantial progress toward a negotiated resolution of this case, without the need for further Court intervention. Defendant respectfully requests an extension of thirty (30) days to July 8, 2020 to submit its response to the complaint in order to finalize the parties’ negotiations and to memorialize their agreement.

As this requested extension of time would affect other scheduled dates, specifically the parties’ submission of a joint letter and proposed case management plan, currently scheduled for June 15, 2020, and the initial pretrial conference, currently scheduled for June 22, 2020, Defendant also respectfully and with Plaintiff’s consent requests that those dates be adjourned.

Hon. Analisa Torres, U.S.D.J.
U.S. District Court, S.D.N.Y.
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This represents Defendant's third request for such an extension of time and related adjournments. The prior requests, also upon consent, were granted (ECF Documents 17 and 19). We appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully submitted,

David Grech

David J. Grech
Brittany L. Primavera

cc: Chambers (*via* email)
All Counsel of Record (*via* ECF and email)

GRANTED. By **July 8, 2020**, Defendant shall answer or otherwise respond to the complaint.

It is further ORDERED that the initial pretrial conference scheduled for June 22, 2020 is ADJOURNED to **July 16, 2020**, at **11:20 a.m.** By **July 9, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: June 5, 2020
New York, New York



ANALISA TORRES
United States District Judge